

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31
(PHASE II)

**AT&T'S SECOND SET OF INFORMATION
REQUESTS TO VERIZON IN PHASE II**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

INFORMATION REQUESTS

1. Refer to Verizon's June 5, 2002 compliance filing, document entitled "Verizon Massachusetts D.T.E. 01-31 Compliance Filing" ("*Compliance Filing Summary*"), at page 3, wherein it states: "Tab C of the filing identifies Verizon MA's Private Line offerings and lists the UNEs that can be used by carriers to provide competing services." Refer also to *Compliance Filing Summary*, at page 8, wherein it states: "A complete list of all Business services and the relevant UNEs that other carriers can use to provide competing services is contained in Tab C."

Please reconcile the above two statements as to whether the services listed in Tab C constitute "all" business services or only "Verizon MA's Private Line offerings."

2. If the Tab C services constitute only Verizon MA's "Private Line offerings," please explain why many of the same services appear in both Tab C and Tab A, Attachment B, given that Verizon is proposing that Private Line offerings not be price deregulated and it is proposing that Tab A, Attachment B services be price deregulated. For example, Verizon lists "Dial tone Line & Local Message/Usage Bus (DTE 10, Part M, Section A, Subsection 1.5.1, under both Tab C and Tab A, Attachment B.
3. Refer to Verizon response to DTE-VZ-2-2, which purports to list the business services to which the price floor rules enunciated by the Department in its Phase I Order apply. Please compare the services listed in DTE-VZ-2-2 to the services listed in Tab A, Attachment B, pages 2-4 (under the heading "Massachusetts Business Services Subject To Market Based Pricing"). In your response, please list each service in Tab A, Attachment B, pages 2-4 (under the heading "Massachusetts Business Services Subject To Market Based Pricing") that does not appear in your response to DTE-VZ-2-2 and, separately for each such service, explain why the price floor rule enunciated by the Department in its Phase I Order does not apply to such service. Please take care to include in your answer why – in Verizon's view – the Centrex Services listed on page 4 of Tab A, Attachment B are not subject to the Department's Phase I Order price floor rules.

Respectfully submitted,

AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.

By its attorneys,

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
Katherine A. Davenport
Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0100

September 20, 2002